## **BAKER & HOSTETLER LLP**

45 Rockefeller Plaza New York, NY 10111

Telephone: (212) 589-4200 Facsimile: (212) 589-4201

David J. Sheehan Nicholas J. Cremona Dean D. Hunt

Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and for the Estate of Bernard L. Madoff

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

CHALEK ASSOCIATES LLC; MORTON J. CHALEK, in his capacity as Managing Member of Chalek Associates LLC and as Trustee for the Trust of Doris Chalek; TRUST OF DORIS CHALEK, in its capacity as a Member of Chalek Associates LLC; FRANCES REISS, in his/her capacity as a Member of Chalek Associates LLC; RICHARD M.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04680 (SMB)

CHALEK, in his capacity as a Member of Chalek Associates LLC; DAVID CHALEK, in his capacity as a Member of Chalek Associates LLC; ISABEL CHALEK, in her capacity as a Member of Chalek Associates LLC; MITCHEL CHALEK, in his capacity as a Member of Chalek Associates LLC; JESSICA DECKER, in her capacity as a Member of Chalek Associates LLC; JOHN TZANNES, in his capacity as a Member of Chalek Associates LLC; PETER TZANNES, in his capacity as a Member of Chalek Associates LLC; and ROBIN TZANNES, in his/her capacity as a Member of Chalek Associates LLC; and ROBIN TZANNES, in his/her capacity as a Member of Chalek Associates LLC,

Defendants.

## **CASE MANAGEMENT NOTICE**

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the "Order") [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

- 1. The Initial Disclosures shall be due: December 21, 2015.
- 2. Fact Discovery shall be completed by: February 13, 2017.
- 3. The Disclosure of Case-in-Chief Experts shall be due: May 4, 2017.
- 4. The Disclosure of Rebuttal Experts shall be due: July 5, 2017.
- 5. The Deadline for Completion of Expert Discovery shall be: August 2, 2017.
- 6. The Deadline for Service of a Notice of Mediation Referral shall be: On or before August 9, 2017.
- 7. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: On or before August 23, 2017.
- 8. The Deadline for Conclusion of Mediation shall be: On or before December 20, 2017.

Dated: New York, New York October 16, 2015

Of Counsel:

## **BAKER HOSTETLER LLP**

811 Main, Suite 1100 Houston, Texas 77002 Telephone: (713) 751-1600 Facsimile: (713) 751-1717

Dean D. Hunt

Email: dhunt@bakerlaw.com

**BAKER & HOSTETLER LLP** 

By: <u>/s/ Nicholas J. Cremona</u>

David J. Sheehan Nicholas J. Cremona 45 Rockefeller Plaza New York, NY 10111 Telephone: (212) 589-4200

Facsimile: (212) 589-4201

Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and for the Estate of Bernard L. Madoff